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*Counsel to the Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re:	:	Chapter 11
	:	
ADVANCE WATCH COMPANY LTD., <u>et al.</u> ,	:	Case No. 15-12690 (MG)
	:	
Debtors. <sup>1</sup>	:	Jointly Administered
	:	
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**NOTICE OF FILING OF SECOND PLAN SUPPLEMENT  
TO THE DEBTORS' FIRST AMENDED JOINT PLAN OF  
LIQUIDATION UNDER CHAPTER 11 OF THE BANKRUPTCY CODE**

**PLEASE TAKE NOTICE** that the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) hereby file the following documents that comprise the Second Plan Supplement to the *Debtors’ First Amended Joint Plan of Liquidation Under Chapter 11 of the Bankruptcy Code* dated December 15, 2015 [Doc. 201] (as further amended, supplemented, or modified from time to time, the “**Plan**”):<sup>2</sup>

**Exhibit A:** Wind Down Budget and Schedule of Administrative Payments

**PLEASE TAKE FURTHER NOTICE** that the Second Plan Supplement and any exhibits, appendices, schedules, supplements, or annexes to the Second Plan Supplement are being filed as a supplement to, in support of, and in accordance with the Plan, and are expressly incorporated into the Plan by reference and made a part of the Plan as if set forth therein.

<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Advance Watch Company, Ltd. (8061); Binda USA Holdings, Inc. (8916); Sunburst Products, Inc. (5972), and GWG International, Ltd. (2468).

<sup>2</sup> All capitalized terms used but not otherwise defined herein and in the exhibit hereto shall have the meanings set forth in the Plan. To the extent a document is identified in the Plan as a document to be included in the *Notice of Filing of Plan Supplement to the Debtors’ First Amended Joint Plan of Liquidation under Chapter 11 of the Bankruptcy Code* [Doc. 218] or the Second Plan Supplement, and has not yet been filed with the Bankruptcy Court, the Debtors will file such document with the Bankruptcy Court as soon as practicable.

**PLEASE TAKE FURTHER NOTICE** that certain documents, or portions thereof, contained in the Second Plan Supplement remain subject to continuing negotiations among the Debtors and interested parties with respect thereto. The Debtors hereby reserve all rights to amend, revise, or supplement the Second Plan Supplement, and any of the documents and designations contained therein, at any time before the Effective Date of the Plan, or any such other date as may be permitted by the Plan or by order of the Bankruptcy Court.

**PLEASE TAKE FURTHER NOTICE** that copies of the Plan and any Plan Supplement(s) may be obtained free of charge (i) at the Debtors' bankruptcy website maintained by Epiq Bankruptcy Solutions LLC (the "**Administrative Agent**") at <http://dm.epiq11.com/AWC>, (ii) by contacting the Administrative Agent in writing at Advance Watch Company, Ltd. Processing Center, c/o Epiq Bankruptcy Solutions, LLC, 10300 SW Allen Boulevard, Beaverton, OR 97005, (iii) by calling the Administrative Agent at 646-282-2500, or (iv) by e-mailing the Administrative Agent [tabulation@epiqsystems.com](mailto:tabulation@epiqsystems.com) (reference "Advance Watch Company" in the subject line of your email). Parties may also obtain copies of the Plan and any Plan Supplement(s) for a fee at the Bankruptcy Court's website, [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov) (a PACER account is required). Please be advised that the Administrative Agent is not permitted to provide legal advice.

**PLEASE TAKE FURTHER NOTICE** that a hearing will be held before the Honorable Martin Glenn, United States Bankruptcy Judge, in Courtroom 501 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York, on **January 20, 2016, at 11:00 a.m. (prevailing Eastern Time)**, or as soon thereafter as counsel may be heard, to consider final approval of the *First Amended Disclosure Statement for Debtors' First Amended Joint Plan of Liquidation under Chapter 11 of the Bankruptcy Code* dated December 16, 2015 [Doc. 205] (as further amended, supplemented, or modified from time to time, the "**Disclosure Statement**") and any objections thereto and to consider any other matter that may properly come before the Bankruptcy Court (the "**Disclosure Statement Hearing**"). A hearing to consider confirmation of the Plan and any objections thereto is scheduled to commence immediately following the Disclosure Statement Hearing (the "**Confirmation Hearing**," and, together with the Disclosure Statement Hearing, the "**Joint Hearing**"). The Joint Hearing may be adjourned from time to time without further notice other than an announcement of the adjourned date or dates at the Joint Hearing or at an adjourned Joint Hearing. The time fixed for the Confirmation Hearing may be rescheduled by the Bankruptcy Court in the event that the Bankruptcy Court does not approve the Disclosure Statement at the Disclosure Statement Hearing or for any other reason. Notice of the rescheduled date or dates, if any, will be provided by an announcement at the Confirmation Hearing or at an adjourned Confirmation Hearing and will be available on the electronic case filing docket.

Dated: New York, New York  
January 19, 2016

Respectfully submitted,

VENABLE LLP

/s/ Andrew J. Currie

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**Exhibit A**

Wind Down Budget and Schedule of Administrative Payments

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	Actual	Projected
	11/18/15 - 1/13/16	1/14/16 – Dissolution
<b>Receipts</b>	33,967	
<b>(i) Allowed Administrative Expense Claims</b>		
Venable	500,500	-
503(b) 9 Claims	-	23,500
Chief Restructuring Officer	-	(50,000)
Otterbourg	200,000	-
Imperial Capital	-	380,130
Claims Agent	76,684	35,816
Trustee Fees	-	25,000
Responsible Officer	32,000	-
<b>Subtotal - Restructuring</b>	<b>809,184</b>	<b>414,446</b>
<b>Post-petition Operating Expenses - Admin Claims</b>	<b>856,004</b>	<b>441,547</b>
<b>(ii) Administrative and Priority Claims Reserve Amount</b>		
Reserve	-	150,000
<b>Total</b>	<b>-</b>	<b>150,000</b>
<b>(iii) Committee Allocation Payment</b>		
UCC - Allocation Payment	725,000	-
<b>Total Funded Plan Payments</b>	<b>2,390,188</b>	<b>1,005,993</b>

The line-item amounts set forth above represent the Debtors' best estimate of total allowable unpaid Administrative and Priority Claims. Actual payments may vary materially on a line-item basis. Some amounts do not include application of retainers.